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PUBLIC SERVICE COMMISSION

March 30, 2001

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Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Room TW-204B  
Washington, D.C. 20554

Re: I/M/O Number Resource Optimization, CC Docket No. 99-200  
Implementation of the Local Competition Provisions of the  
Telecommunications Act of 1995, CC Docket No. 96-68 and  
Petition of the Maryland Public Service Commission for  
Additional Delegated Authority to Implement Number  
Conservation Measures, NSD File No. L-00-171

Dear Secretary Salas:

Enclosed please find an original and seven (7) copies of the Maryland Public Service Commission's Motion for Extension of Time to file its opposition to the Application for Review of Sprint Corporation in the above captioned matter. This motion has also been filed electronically and served by fax on all parties of record.

Please file-stamp one copy and return it to me in the enclosed envelope. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, reading "Miles H. Mitchell".

Miles H. Mitchell  
Deputy General Counsel

Enclosures

cc: Yog R. Varma, Deputy Chief, Common Carrier Bureau  
Network Service Division

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of

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Number Resource Optimization

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CC Docket No. 99-200

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Implementation of the Local Competition  
Provisions of the Telecommunications Act  
of 1996

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CC Docket No. 96-68

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Petition of the Maryland Public Service  
Commission for Additional Delegated  
Authority to Implement Number  
Conservation Measures

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NSD File No. L-00-171

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**MOTION FOR EXTENSION OF TIME**

Pursuant to Section 1.46 of the Federal Communications Commission's ("Commission") Rules of Practice and Procedure (47 CFR 1.46), the Public Service Commission of Maryland (or "the MD PSC") respectfully requests an extension of time to file a formal opposition to Sprint Corporation's ("Sprint") Application for Review of Common Carrier Bureau Order DA 01-386, dated February 14, 2001, and as grounds therefore, the MD PSC states as follows:

1. On August 11, 2000, the Public Service Commission of Maryland petitioned the Commission for additional delegated authority to implement number conservation measures. The Common Carrier Bureau granted the MD PSC the requested authority in Order DA 01-386, dated February 14, 2001. In its Order, the Common Carrier Bureau delegated to certain states, including Maryland, the authority to order rationing after area code relief is implemented and to hear and address requests for additional numbers outside the rationing process.

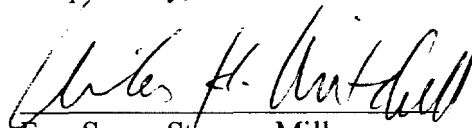
2. On March 16, 2001, Sprint filed an application for review of the Common Carrier Bureau's Order. Under the Commission's rules, oppositions to Sprint's Application are on Monday, April 2, 2001. The MD PSC, however, was not served with a copy of Sprint's Application and did not learn of the filing until late on Thursday, March 29, 2001.

3. Present commitments of the MD PSC and its Staff with regard to other pressing business may prevent the MD PSC from meeting the April 2, 2001 filing deadline. The Commission requests, therefore, a brief extension until April 6, 2001 to file its opposition. The MD PSC does not believe that other parties will be prejudiced by this requested extension. The MD PSC intends to file its opposition electronically and to serve all parties on the service list via facsimile. Thus, Sprint and other parties should receive the MD PSC's opposition at or about the same time it would have been received had it served by regular mail.

4. In accordance with Section 1.46(c), the MD PSC has notified other parties and Commission Staff personnel responsible for acting on the motion that this motion is being filed.

WHEREFORE, the Public Service Commission of Maryland respectfully requests an extension to April 6, 2001 to file its opposition to Sprint's Application for Review.

Respectfully,

A handwritten signature in dark ink, appearing to read "Susan H. Miller", is written over a horizontal line.

For: Susan Stevens Miller

General Counsel

Public Service Commission of Maryland

6 St. Paul Street

William Donald Schaefer Tower, 16<sup>th</sup> Floor

Baltimore, MD 21202

Tel: (410) 767-8038

## CERTIFICATE OF SERVICE

I, Miles H. Mitchell, hereby certify on that on this 30<sup>th</sup> day of March 2001, I served a copy of the foregoing Motion for Extension of Time by U.S. first-class mail indicated below to following person:

ITS  
1231 20<sup>th</sup> Street, N.W.  
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Common Carrier Bureau  
Federal Communications Commission  
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Eve Kahao Gonzalez  
General Counsel  
Louisiana Public Service Commission  
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\*Jane E. Mago  
Acting General Counsel  
Federal Communications Commission  
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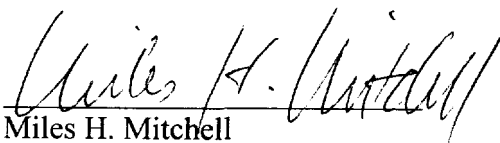
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Miles H. Mitchell